

REMARKS/ARGUMENTS

Reconsideration and allowance are respectfully requested. No new matter is added by the amendments herein.

Claims 1, 3-10, 11, and 13-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0031053 to Lim et al. ("Lim") in view of U.S. Patent Application Publication No. 2003/0126623 to Hara, et al. ("Hara"). Claims 2 and 12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lim in view of Hara, and further in view of U.S. Patent Application Publication No. 2003/0198566 to Takamine, et al. ("Takamine").

The rejections are respectfully traversed in view of the amendments and remarks herein.

Independent Claim 1

Independent claim 1 as amended recites a set top box (STB) coupled to a TV service provider headend and having an STB DVI interconnect, and when an HDTV DVI interconnect is initially electrically coupled to the STB DVI interconnect, the HDTV presents a data signal to the STB and the STB presents the data signal to the headend.

The Office Action alleges that Lim teaches all of the claimed features, with the exception of the STB and HDTV DVI interconnects. However, Lim fails to teach or suggest any signal being transferred from the HDTV to the STB, and from the STB to the headend, regardless of whether that signal is being transferred over the recited DVI interconnects. Claim 1 clearly requires (both prior to and after the present amendment) that the signal presented by the HDTV is also presented by the STB to the headend.

The portions of Lim referenced by the Office Action have nothing to do with this claim feature. In paragraphs 0012 and 0015, Lim merely discloses that a client session may be set up by a communication protocol between the client terminal device and the zapping server, and further discloses that a program-selection request (e.g., a channel change request) may be provided by the client terminal device to the zapping server. However, neither of these functions have anything to do with a signal being presented by the HDTV to the client terminal device, that signal also being transferred from the client terminal device to the zapping server.

Nor does the addition of Hara overcome this deficiency of Lim. Hara is asserted for the proposition that HDTVs have DVI interconnects. Applicant does not dispute that conventional STBs and conventional HDTVs have DVI interconnects. It is the claimed use of the DVI interconnect that is believed to be new. The combined system of Lim and Hara would merely result in the functionality of Lim described above, in which the HDTV is connected to the STB via a DVI connection. However, the modified version of Lim still would not present a signal from the HDTV to the STB, that signal being further presented by the STB to the zapping server (or any other portion of the headend).

For at least these reasons, it is respectfully submitted that claim 1 is allowable over Lim and Hara, either alone or in combination.

Independent Claims 11, 20, 21, and 24

It is submitted that independent claims 11, 20 (which is not amended), 21, and 24 are also allowable over Lim and Hara for at least similar reasons as discussed above with regard to claim 1.

Dependent Claims

The dependent claims are also allowable by virtue of depending from allowable independent claims, and further in view of the additional features recited therein.

Conclusion

All rejections having been addressed, it is submitted that the present application is in condition for allowance. The Examiner is invited to telephone the undersigned with any questions.

Respectfully submitted,

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